

THE HONORABLE LAUREN KING

UNITED STATES OF DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LEO’S WELDING and FABRICATION,
LLC, a Washington limited liability company

Case No. 2:25-cv-00625 LK

Plaintiffs,

v.

ANSWER TO AMENDED
COMPLAINT AND AFFIRMATIVE
DEFENSES

HANNAH, Official Number 1067457, her
machinery, engines, equipment, cargo
appurtenances, *in rem* and SAYAK
LOGISTICS, LLC, an Alaska limited liability
company dba NORTHLINE SEAFOODS *in*
personam

Defendants.

COMES NOW defendant SAYAK LOGISTICS, LLC (“Defendant”), and by way
of its Answer and Affirmative Defenses to the Amended Complaint of plaintiff LEO’S
WELDING and FABRICATION, LLC, admits, denies, and alleges in like-numbered
paragraphs as follows:

1. Paragraph 1 states legal conclusions and therefore no admission or denial
is required.

2. Defendant is without sufficient information to admit or deny Paragraph 2

and therefore denies the same.

3. Admitted.

4. Admitted.

5. Admitted.

6. Admitted.

7. Admitted that Plaintiff's Customer Statement is attached as Exhibit 2. All other averments of Paragraph 7 are denied.

8. Denied.

9. Admitted that Plaintiff filed a lien that is attached as Exhibit 3. All other averments of Paragraph 9 are denied.

10. Denied.

11. Paragraph 11 states a legal conclusion and therefore no admission or denial is required.

AFFIRMATIVE DEFENSES

By way of further Answer and for its Affirmative Defenses to Plaintiff's Complaint, Defendant states:

1. Failure to state a claim upon which relief can be granted.

2. Such other defenses as may be discovered during discovery.

PRAYER FOR RELIEF

WHEREFORE, for the above-stated reasons, Defendant prays for the following:

1. For entry of Judgment against Plaintiff and in favor of Defendant and for dismissal of Plaintiff's claims with prejudice;

2. For entry of Judgment in favor of Defendant and against Plaintiff for all damages caused by Plaintiff's breach of contract with Defendant;

3. For a declaration that the HANNAH is not subject to the lien claim Plaintiff has failed against the vessel;

4. For an award of attorney's fees and costs in favor of Defendant and against Plaintiff under the terms of the parties' agreement.

5. For such other relief as the Court may deem just and equitable.

DATED this 13th day of May, 2025.

HOLMES WEDDLE & BARCOTT, P.C.

/s/ Michael A. Barcott
Michael A. Barcott, WSBA #13317

/s/ John E. Casperson
John E. Casperson, WSBA #14292

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Attorneys for Defendant Sayak Logistics,
LLC d.b.a. Northline Seafoods

1. CERTIFICATE OF SERVICE

2. The undersigned certifies under penalty of perjury
3. of the laws of the State of Washington that, on the
4. 13th day of May 2025, the foregoing was electronically
filed with the Clerk of Court using the CM/ECF system,
which will send notification of such filing to the following:

5. Attorneys for Plaintiff:
6. Brian C. Zuanich, WSBA #43877 - brian@zuanichlaw.com
7. Robert Zuanich, WSBA #9581 - rpz@zuanichlaw.com
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9. *Alegria S Forman*
10. Alegria S. Forman